

REMARKS

Claims 1-16 were pending at the time of examination. Claim 15 has been amended. No claims have been canceled. The applicants respectfully request reconsideration based on the foregoing amendments and these remarks.

Claim Rejections – 35 U.S.C. § 102

Claims 1-14 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,704,768 to Zombek et al. (hereinafter Zombek). The applicants respectfully traverse the rejection for the following reasons.

As was mentioned in the previous response, the applicants' invention relates to a system and method for enabling the interchange of enterprise data through an open platform. The open platform can be based on a standardized interface that enables parties to easily connect to and use the network. Services operating as senders, recipients and in-transit parties can leverage a framework that overlays a public network (Abstract). Zombek, on the other hand, is directed to a system, method and computer program product for providing server discovery services during a startup sequence. More specifically, Zombek discloses a system for communicating messages in a client-server environment over one or more wireless networks that can support different network protocols.

Step (a) of claim 1 specifically recites an identifier that is associated with an entity that has been authenticated by the message routing network and that "is to be associated with an entity account upon authentication of said entity with a first service that supports said entity account." It is respectfully submitted that none of the cited sections of Zombek shows such an identifier. The only identifier that is discussed in the cited sections of Zombek is a "server identifier (ID)" for the back end server (BES) which may be provided as part of registration upon boot (col. 20, lines 27-39). This server identifier is clearly not to be "associated with an entity account upon authentication," as required by claim 1. For at least this reason, it is respectfully submitted that step (a) is not anticipated by the cited sections of Zombek.

Next, step (b) of claim 1 recites receiving a message that is directed to a mapped service and that "said mapped service is an entity account-specific representation of said first service and acts as a proxy for said first service." The Examiner alleges that this step is anticipated by Zombek's message router (MR) 124 acting as a mapped service. The applicants respectfully disagree. The applicants acknowledge that in a very broad sense, the MR of Zombek can be interpreted as acting as a proxy for the BESs. However, the MR is not an "entity account-

specific representation of said first service," as required by claim 1. At best, the MR can be considered to be a proxy for all the BESSs, and does not provide any kind of specificity with respect to entity accounts for a particular service. For at least this reason, it is respectfully submitted that step (a) is not anticipated by the cited sections of Zombek.

Step (c) of claim 1, as amended, recites "translating, by said message routing network, said message for delivery to said first service, wherein said translated message includes said identifier and is directed from said mapped service to said first service." That is, the mapped service translates the received message and sends it to the first service. During the translation the same identifier is kept in the message, such that the first service knows with which entity account the translated message is associated. However, the first service sees the message as originating from the mapped service and is not necessarily aware of that the message originated from the second service, depending on what translation mechanisms are used.

The Examiner alleges step (c) is anticipated by col. 32, lines 46-50, col. 20, lines 47-52, and col. 22, lines 22-29 of Zombek. The applicants respectfully disagree. As discussed above, Zombek does not disclose any mapped service of the type that is required by claim 1 (i.e. "entity account-specific representation of said first service"). Furthermore, as was discussed in the previous response, the "HTTP redirector" of Zombek, which was cited as anticipating the translating of the message, is located at the client. Thus, the "translation" in Zombek occurs at the client, and before the message or request in question enters the "network." In contrast, claim 1 requires that the translation be done "by said message routing network."

The Examiner argues on page 9 of the Office Action that "a HTTP redirector that performs the translation is located at the client that is part of the message routing network." The applicants respectfully disagree with this statement. For example, FIG. 2 of Zombek clearly shows that the client device 112 is not considered to be part of the network 212. This is also supported in several places throughout the specification, for example, col. 8 lines 42-44 state that "FIG. 2 is a block diagram of ... a redirector that interacts with a browser and the intelligent messaging network..." Similarly, col. 32, lines 45-50 discuss how the HTTP redirector can intercept a raw HTTP request and package it "into an intelligent messaging network message" which can be "transmitted through the intelligent messaging network," col. 32, lines 57-59 specify that the "network... can include the intelligent messaging network... e.g., the underlying LAN network... the PGs...the firewall...router...and the MR," and so on. For at least these reasons, it is clear that Zombek considers the network and the HTTP redirector on the client to be two separate entities. Thus, the translation is not done "by said message routing network," as required by claim 1.

Also, step (c) of claim 1 requires that the translated message is "directed from said mapped service to said first service." If one, for the sake of argument, were to adhere to the Examiner's interpretation of the Zombek's MR as being equivalent to the "mapped service," and also consider that the translation occurs on the client, then the translated message would be sent to the mapped service from the HTTP redirector, not from the mapped service to said first service, as required by claim 1. For at least these reasons, it is respectfully submitted that claim 1 is neither anticipated, nor rendered obvious by Zombek and it is respectfully requested that the rejection under 35 U.S.C. § 102(e) be removed.

Claim 9 is a *Beauregard* claim corresponding to claim 1, and is therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 1, and the rejection of claim 9 under 35 U.S.C. § 102(e) should be withdrawn.

Claim 10 is directed to a message routing system including a message routing network that enables routing of a message between a first service and a second service. The message is associated with an account that is supported by the second service. The message routing network effects a virtual service through which the first service and the second service communicate. The implementation of the virtual service is supported by a mapping that associates the virtual service with the account. As described in paragraph [1023] of the applicants' specification, the virtual service can act as a proxy to other services. This can be useful, for example, when a business X has a relationship with a business Y, and would like that messages sent to business X's service are redirected to business Y's service. Services can implement redirection through routing scripts that map invocations of the service to invocations of another service, including redirection of replies.

The Examiner alleges that this is shown in col. 22, lines 50-65 of Zombek. The applicants respectfully disagree. The cited section of Zombek discloses the operations of the MR when it receives an incoming message from a client application. Depending on the type of message that is received, a number of different actions may be taken by the MR. The message router of Zombek does not function as a proxy through which two services communicate, as required by claim 10. Rather, the message router (124) of Zombek merely does a one-time determination (through a number of alternative mechanisms) of where to send a message (i.e., to which BES) when the message does not contain any explicit BES ID. Also, similarly to what was discussed above with respect to claim 1, even if one were to interpret the MR of Zombek as a "virtual service," the MR would still not fulfill the last clause of claim 10, which requires that the "implementation of said virtual service is supported by a mapping that associates said virtual service with said account." Zombek's MR is not associated with any accounts, as was discussed

above. For at least these reasons, it should be clear that the applicants' invention, as defined in claim 10, is neither anticipated nor rendered obvious in view of Zombek, and the rejection of claim 10 under 35 U.S.C. § 102(e) should be withdrawn.

Claims 2-8 all depend from claim 1, and are therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 1, and the rejections of claims 2-8 under 35 U.S.C. § 102(e) should be withdrawn.

Claims 11-14 all depend from claim 10, and are therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 10, and the rejections of claims 11-14 under 35 U.S.C. § 102(e) should be withdrawn.

Claim Rejections – 35 U.S.C. § 103

Claims 15-16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Zombek in view of U.S. Patent No. 6,470,357 to Garcia et al. (hereinafter Garcia). The applicants respectfully traverse the rejection for the following reasons.

Claim 15, as amended, is directed to a message routing method. A proxy service is provided by the message routing network for messages transferred between a first application service provider and a second application service provider in the message routing network. The first application service provider and the second application service provider provide application services for an enterprise. The proxy service enables the first application service provider to send information on behalf of the enterprise to the second application service provider without the first application service provider and the second application service provider having knowledge of each other at any point in time.

The Examiner alleges that the provision of the proxy service is shown by the Proxy IP/Port (204) and the HTTP Redirector (106) of Zombek. The applicants respectfully disagree. Both the Proxy IP/Port (204) and the HTTP Redirector (106) of Zombek are located in the client, as can be seen in FIG. 2. In the applicants' invention, on the other hand, the proxy service is provided "by the message routing network," as required by claim 15. Furthermore, these application service providers, as defined in claim 15, are "providing application services for an enterprise." Zombek does not disclose any messaging, or proxy services involved in messaging, between application service providers. Nor does Zombek disclose the claimed limitation of "said proxy service enabling said first application service provider to send information on behalf of said enterprise to said second application service provider." Zombek merely discloses sending messages from a client device to a back-end server, through a proxy located in the client device.

Furthermore, neither Zombek nor Garcia teaches sending information "without said first application service provider and said second application service provider having knowledge of each other at any point in time," as required by claim 15. Garcia discloses a system and method for routing messages between applications in a telecommunications management network. The cited section of Garcia states that it allows messages to be routed between telecommunications management applications "without requiring the sending application to know which application should receive the message and the characteristics of the application that will receive the message" (col. 1, lines 38-41). However, Garcia discloses an Enhanced Directory Service (EDS), which "provides the routing information to the requesting application or to a dispatcher process...that routes the message between requesting and requested applications" (col. 5, lines 36-39). Thus, during the routing process of Garcia, the sending application becomes aware of the receiving application's identity. Therefore Garcia does not cure this deficiency of Zombek, as alleged by the Examiner. For at least these reasons, the rejection of claim 15 under 35 U.S.C. § 103(a) is unsupported by the cited art and should be withdrawn.

Claim 16 depends from claim 15, and is therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 15, and the rejection of claim 16 under 35 U.S.C. § 103(a) should be withdrawn.

Conclusion

The applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,
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